

August 12, 2019

U.S. District Court  
William McCool, Court Clerk  
Clerk's Office  
700 Stewart Street, Suite 2310  
Seattle, WA 98101

\_\_\_\_ FILED \_\_\_\_\_ ENTERED  
\_\_\_\_ LODGED \_\_\_\_\_ RECEIVED

AUG 14 2019

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY \_\_\_\_\_ DEPUTY

Re: 2:19-cv-01105-JCC Termination of Plaintiffs' Attorney

Dear Sir,

This letter is in response to one, the 8/09/2019 docket note made in this case by "TH", and to the fact that I have been informed that there is a typo in the *Notice of Termination of Legal Representation* that I filed last Friday in this case, also on August 9<sup>th</sup>.

In regards to the latter, I inadvertently left a remnant of the law firm's name on the Notice above the signature lines; I want to assure the court that the word processing artifact was not a function of either trying to give the impression that I was engaged in the act of trying to impermissibly withdraw the attorneys in question; or two, in the alternative that the Notice was intended to act as an withdrawal by the attorney. The firm's name appearing in the document was strictly a typo.

It is my understanding that typically, no special formality is required for a client to discharge an attorney; any act by the client indicating an unmistakable purpose to sever the relationship is enough. *Hanlin v. Mitchelson*, 794 F.2d 834, 842 (2d Cir.1986). A client may discharge its attorney at any time, even without cause. *Doggett v. Deuville Corp.*, 148 F.2d 881, 882 (5<sup>th</sup> Cir.1945)' *MacLeod v. Vest Transp.*, 235 F.Supp. 369, 371 (N.D.Miss.1964).<sup>1</sup>

Accordingly, I provided in addition to a letter mailed directly to former counsel for Discovery Park Community Alliance and myself, Dickson Frohlich, I provided notice to the Court and the other party in this matter, the City of Seattle about that termination. This was done to ensure one, that all parties to this case had been formally notified, and two, to create an official record of that termination, its time, and date. Other than that, the ongoing expectation I had and have is that the remaining procedure necessary to remove the law firm in question from this matter and to set in place replacement counsel will continue to proceed in accordance with the court rules.

Sincerely,



ELIZABETH A. CAMPBELL  
PERSONALLY  
PRO SE



DISCOVERY PARK COMMUNITY ALLIANCE  
4027 21<sup>ST</sup> AVENUE WEST #206  
SEATTLE, WA 98199

Cc: Dickson Frohlich  
Roger Wynne, City of Seattle

<sup>1</sup> Smith, Michael C. "O'Connor's Federal Rules Civil Trials 2019 ed.". Thomson Reuters. 2019

**CERTIFICATE OF MAILING**

The undersigned declares under penalty of perjury under the laws of the State of Washington that on this day, I provided a true and accurate copy of the letter to the U.S. District Court Clerk to which this declaration is affixed to the following in the manner so indicated:

<b>PARTY</b>	<b>DELIVERY METHOD</b>
Roger Wynne Seattle City Attorney 701 Fifth Avenue, Suite 2050 Seattle, WA 98199	<input checked="" type="checkbox"/> First-Class Mail, Postage Prepaid
Dickson Frohlich 2101 4 <sup>th</sup> Avenue, Suite 1830 Seattle, WA 98121	<input checked="" type="checkbox"/> First-Class Mail, Postage Prepaid

Dated this 12<sup>th</sup> day of August, 2019 at Seattle, Washington.



Elizabeth A. Campbell, MPA  
4027 21<sup>ST</sup> AVENUE WEST #206  
SEATTLE, WA 98199

August 12, 2019

Mr. Roger Wynne, Assistant City Attorney  
Seattle City Attorney's Office  
701 Fifth Avenue, Suite 2050  
Seattle, WA 98104-7095

Roger,

Dickson and Frohlich has just now deigned to share with me your email you sent to them from last Friday.

As I have noted to you in the past, I'm not part of the lawyer corps of mutual support and assistance. You have zero knowledge about the matters involving the relationship or lack thereof between our former counsel and ourselves, so your disingenuous commentary is lost on me to them about handling "your situation".

The notice of termination that was filed was never intended to serve as a notice of withdrawal of any kind; it was correctly presumed that Dickson & Frohlich would handle the court procedure for their formal withdrawal.

In addition, the filing of the notice was to make it abundantly clear to all parties, to plaintiffs' attorneys, the City's attorneys, and the court that Dickson and Frohlich's services had been terminated for cause; including but not limited to a belief that they had violated the rules of professional conduct in this matter.

It was also well understood by myself that when filing the notice that the U.S. District Court's CM/ECF system would send automatic notices to the attorneys of record in this matter with links to it – therefore it had the additional benefit that a record of the notice of termination had been made to the attorneys of record and when it had been made.

There will be no substitute counsel at this time until a replacement counsel can be found for both plaintiff parties. That was also made clear in the notice. Accordingly, you can run all the communications you want past and to your folks at Dickson and Frohlich you want, however let's be very clear with all of this - there are no ongoing communication channels between Dickson and Frohlich and myself; and in fact there have not been any for quite some time; that has been their approach in this matter for several weeks now.

Therefore, whatever you've been talking with them about or want to talk to them about you have done so and you continue to do so for your own purposes and for your own pleasure. In fact, 1) it is amazing that I'm seeing this little note from you to them at this time, and 2) they have only done so because they think it holds some value to me, part of the on-going hostile environment they have initiated and maintained against their clients.

Sincerely,



Elizabeth A. Campbell

DISCOVERY PARK COMMUNITY ALLIANCE



Elizabeth A. Campbell  
Founder and Director

Cc: Dickson Frohlich  
Filed for informational purposes with the U.S. District Court Western District of Washington – Seattle



English

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Dated this 12<sup>th</sup> day of August, 2019 at Seattle, Washington.



Elizabeth A. Campbell, MPA  
4027 21<sup>ST</sup> AVENUE WEST #206  
SEATTLE, WA 98199

August 12, 2019

U.S. District Court Western Washington District  
Clerk's Office  
700 Stewart Street, Suite 2310  
Seattle, WA 98101

Re: 2:19-cv-01105-JCC

Dear Sir,

I am unable to visit the court in person today to file these documents. I am asking for your assistance with them.

Enclosed please find:

1. One original and one copy of the following document, letter to clerk of the court William McCool, and two, letter to City of Seattle attorney in this matter, Roger Wynne.

Both are being submitted for filing in the court record. Please stamp and file these documents for me.

Thank you for your attention to this matter. .

Sincerely,



ELIZABETH A. CAMPBELL  
PERSONALLY  
PRO SE



DISCOVERY PARK COMMUNITY ALLIANCE  
4027 21<sup>ST</sup> AVENUE WEST #206  
SEATTLE, WA 98199

Return Address:  
4027 21st Avenue W Suite 206  
Seattle WA 98199

U.S. District Court  
William McCool, Court Clerk  
Clerk's Office  
700 Stewart Street, Suite 2310  
Seattle, WA 98101

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